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8 Attorneys for Defendant
9 Pan-American Life Insurance Company

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 DONNA MATHEWS,

13 Plaintiff,

14 vs.

15 PAN-AMERICAN LIFE INSURANCE
COMPANY,

16 Defendant.
17

No.: C 07-02757 SBA

**STIPULATION TO CONTINUE THE
HEARING ON MOTION FOR SUMMARY
JUDGMENT, OR ALTERNATIVELY
PARTIAL SUMMARY JUDGMENT**

Proposed New Date: July 15, 2008
Current Hearing Date: July 1, 2008

Honorable Sandra B. Armstrong

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20 IT IS HEREBY STIPULATED by and between the parties hereto, and through their
21 respective attorneys of record, as follows:

22 1. The hearing on the Motion for Summary Judgment, or Alternatively, Partial
23 Summary Judgment, of Defendant Pan-American Life Insurance Company in this matter is
24 currently set for July 1, 2008 at 1:00 p.m.

25 2. On June 27, 2008, the parties attended a mediation before James Mart, Esq. of JAMS
26 in San Francisco.
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5. The parties therefore stipulate and request that the Court continue the hearing on Pan-American's Motion for Summary Judgment, or Alternatively Partial Summary Judgment, currently set for July 1, 2008 at 1:00 p.m. to July 15, 2008, at 1:00 p.m.

DATED: June 30, 2008.

By /s/ Thomas A. Evans
Thomas A. Evans
Eugenia S. Chern
Attorneys for Defendant
Pan-American Life Insurance Company

By _____
Michael E. Kinney
Attorneys for Plaintiff Donna Mathews

1 3. Although the parties did not reach a settlement of this matter on June 27, they did
2 make substantial progress and intend to continue their discussions, including a further session with
3 the mediator on July 1.

4 4. Because the parties believe further mediation would be productive, they have agreed
5 to request a continuance of the hearing on Pan-American's motion to permit them to focus on the
6 possible resolution of this action.

7 5. The parties therefore stipulate and request that the Court continue the hearing on Pan-
8 American's Motion for Summary Judgment, or Alternatively Partial Summary Judgment, currently
9 set for July 1, 2008 at 1:00 p.m. to July 15, 2008, at 1:00 p.m.

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13 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

14 DATED: June 30, 2008.

15 REED SMITH LLP

16
17 By _____
18 Thomas A. Evans
19 Eugenia S. Chern
20 Attorneys for Defendant
21 Pan-American Life Insurance Company

22 LAW OFFICE OF MICHAEL E. KINNEY

23 By Michael E. Kinney
24 Michael E. Kinney
25 Attorneys for Plaintiff Donna Mathews
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27
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